
From: Allison Castellan - NOAA Federal
To: Carlin, Jayne; Waye, Don; Henning, Alan; Wu, Jennifer; Solloway, Chris
CC: Melissa Rada - NOAA Affiliate
Sent: 7/25/2014 2:08:53 PM
Subject: Updated Ag Comments and Summary Comments/Responses for Review
Attachments: Consolidated Ag Comments.xls; Response to Comments DRAFT 072514.doc

All--

First, I apologize in advance for the long email but please read to the end. I won't be able to make the call on Tues so trying to get some thoughts across you could discuss on Tues while I'm gone.

Second, it took longer than expected, but Melissa and I finally wrapped up adding in the additional comments the Ag group identified from the letters into our Excel spreadsheet as well as revising the Ag summary comments to make sure all comments are addressed.

Thirds, the updated Response to Comments doc also includes my draft responses to most of the "general" comments (See Sections I-V)--welcome comments...especially from Jayne/Don since I know the others are working on their own sections.

A few things to note:

1. Coded Ag Comments: Given the size of the spreadsheets we did not insert the new Ag comments into the master spreadsheet with all of other categories. Rather, we created a separate spreadsheet for just the consolidated Ag comments (Consolidated Ag Comments) and then broke them out by the new categories the Ag Subteam recommended (Consolidated Ag Comments_new category codes). After looking at how the comments fell out, we noticed a lot of duplication among some of the categories (same comments appearing under multiple categories) so we rolled up and revised the Ag Team's recommended categories into headings that we thought best fit the comments we had to avoid a lot of redundancies.

2. Summary Ag Comments: I placed the old Ag summary comments in the "Response to Comments" document with the new summary comments. See new Table of Contents to easily find the Ag comments.

3. Expanded General Pesticides Section: In updating the Ag comments, Melissa and I realized that there are a lot of pesticide themed comments that do not directly speak to Ag or Forestry issues. Therefore, we created a new "Pesticides-General" section to capture some of these comments. There is still a little overlap with the Ag and Forestry pesticide sections but I don't know how to avoid it. So that we don't have to repeat ourselves in the responses, perhaps we could use the "refer to response to comment X" phrase or something similar if we already addressed a particular point responding to another comment? This will likely come in handy for several other categories that have overlap as well.

4. Response to General Comments: Jayne/Don, please review the responses I've drafted to the general comments. Note that I still need to draft responses to III.A and V.A&B and there are some placeholders in some of the other responses (yellow highlights) for things we'll need to fill in later or that I'm hoping EPA can fill in now for your program.

5. Need to Assign Leads for Some Sections: See the comment on the Table of Contents page on the Response to Comments doc. We've done a good job divvy up most of the comment categories but there are a few related to forestry that I don't believe have a lead assigned. I know Alan has a lot on his plate with Forestry Riparian and Ag but perhaps others would be willing to take on some of the remaining forestry responses?

6. Responding to "Sticky" Comments: Looking at a lot of the comments we received, its going to take some time and careful thought to craft good responses to many of these comment, especially the Ag and Pesticides ones (so don't

wait until the Mngt Team discussion...start crafting the parts of the response you can right now!). Thinking about how we may want to respond, I took a few of the comments (see VI.A, X.A and X.B (yellow highlights)) and drafted some bullets to capture some of the points we'd want to make in our response. The team can then provide feedback if these are the right points we want to make before we spend a lot of time developing a full response. I'd be interested in feedback on this approach and if folks would find it useful? Just trying to think of some way to help guide further team input on responses and help those that are the leads with developing the responses.

I think that's all!

Allison

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